

Exhibit 7

From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Sent: Friday, August 13, 2021 3:33 PM
To: Sappington, Matthew; kstoops@sommerspc.com
Cc: Schnitzer, David A.; jthompson@sommerspc.com; Seth Lesser; Bailey, Elaina S; Schwartz, Jason C.; Nelson, Karl G.; Doerr, Adam; Dziuban, Michael R.; Fitzgerald, Cara; Timothy Becker; Amir Alimehri; Johnston, Rod M; tkashima@sommerspc.com; Ash, Rob; Vaughn, Wendy E; Nichols, Debbie A; DeCoste, Annette; Zack Kaylor; JRusch@johnsonbecker.com; Gorman, Brian; Senger, Molly T.; Vanderbeke, Danelle J
Subject: RE: Lowe's MDL | Depositions
Attachments: Pltfs Dep Notices 08.13.21.zip

[WARNING: External Email]

Good Afternoon Counsel,

I-In response to your email from yesterday:

- a. Named Plaintiffs
 - 1. Jennifer Belaski - August 17 at 9:30 a.m. ET-Postpone and will reschedule
- b. Opt-In Plaintiffs
 - 1. Amanda Demato - August 17 at 9:30 a.m. ET- Postpone and will reschedule
 - 2. Nicholas Glasser - August 18 at 9:30 a.m. ET- Postpone and will reschedule
 - 3. David Berry - August 18 at 9:30 a.m. ET- Postpone and will reschedule
 - 4. Venecia Guntharp - August 18 at 1:30 p.m. ET- Postpone and will reschedule
 - 5. Jeffrey Hurteau - August 19 at 9:30 a.m. ET- Postpone and will reschedule
 - 6. Elaine Martinez - August 19 at 9:30 a.m. ET-Confirmed
 - 7. Matthew Thornton - August 19 at 1:30 p.m. ET- Postpone and will reschedule
 - 8. Carrie Krapf - August 20 at 9:30 a.m. ET- Postpone and will reschedule
 - 9. Diana Brandes - August 20 at 9:30 a.m. ET- Postpone and will reschedule
 - 10. Ryan Murphy - August 20 at 1:30 p.m. ET- Postpone and will reschedule

II-Please be advised that we no longer require the deposition of Senior Corporate Investigator, Nathan Bradfield. Thank you for providing availability for Mr. Bradfield.

III-Please find attached deposition notices for the following. Please advise of date/time changes.

- 1. James Hilliard- August 18 at 9:30am ET
- 2. Mary Day - August 20 at 9:30am ET
- 3. Mark Darcey -August 20 at 1:30pm ET
- 4. Michael Gregory - August 23 at 9:30am ET
- 5. Chris Savage - August 23 at 1:30pm ET
- 6. Mike Lomis - August 24 at 9:30am ET
- 7. Richmond Epps - August 24 at 1:30pm ET
- 8. Ram Krishnamurthy- August 25 at 9:30am ET
- 9. Mary Lou Villers- August 25 at 9:30am ET
- 10. George Saunders- August 25 at 1:30pm ET
- 11. Jamie Hill- August 26 at 9:30am ET
- 12. Greg Nolan- August 26 at 1:30pm ET
- 13. Valerie Lane- August 27 at 9:30am

14. Craig Store -August 27 at 1:30pm ET
15. Greg Morris-August 30 at 9:30am ET
16. Gene Allison -August 30 at 1:30pm ET
17. LeShaun Pettit-August 30 at 1:30pm ET
18. David Williams- September 1 at 9:30am ET
19. Nick Thompson-September 1 at 1:30pm ET
20. Ismet Eikn- September 2 at 9:30am ET
21. Scott Knapp- September 3 at 9:30am ET
22. Vanessa Church-September 6 at 9:30am ET
23. Albert Preiwisch- September 9 at 9:30am ET
24. Ben Bolden- September 10 at 9:30am ET
25. Jason Cottle- September 13 at 1:30pm ET

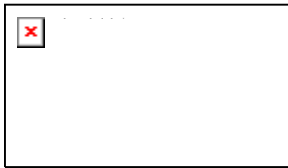
Thank you.

Regards,

Danelle J. Vanderbeke

Class Action and Complex Litigation Group

One Towne Square, 17th Floor | Southfield, MI 48076
Direct Dial: (248) 746-4593 | Direct Fax: (248) 936-2147
dvanderbeke@sommerspc.com | www.sommerspc.com



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From: Sappington, Matthew <MSappington@gibsondunn.com>

Sent: Thursday, August 12, 2021 4:48 PM

To: Stoops, Kevin J <KStoops@sommerspc.com>

Cc: Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Thompson, Jason J <JThompson@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADOerr@robinsonbradshaw.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton R <TKashima@sommerspc.com>; Ash, Rob <CRash@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; JRusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>; Senger,

Molly T. <MSenger@gibsondunn.com>; Sappington, Matthew <MSappington@gibsondunn.com>

Subject: RE: Lowe's MDL | Depositions

[EXTERNAL EMAIL]

Counsel:

Please note the following with respect to deposition scheduling:

1. Although Mr. Stoops will be deposing Mr. Krishnamurthy remotely, please be advised that we still will be defending his deposition in person. Additionally, please issue the requested amended notice, making clear that his deposition will be held on August 25.
2. As you know, on August 2, Lowe's (re)noticed the depositions of 26 Plaintiffs, yet despite multiple follow-up requests, we have heard from you regarding only three of those depositions. (We have yet to hear from you regarding any of the 25 Opt-in Plaintiff depositions that we noticed on August 9.) Please let us know by **4:00 p.m. ET tomorrow** whether the 11 depositions listed below are proceeding **next week**. As we have repeatedly told you, we would appreciate the courtesy of a week's notice for depositions, and already are less than a week away from Named Plaintiff Jennifer Belaski's re-noticed August 17th deposition.
 - a. Named Plaintiffs
 1. Jennifer Belaski - August 17 at 9:30 a.m. ET
 - b. Opt-In Plaintiffs
 1. Amanda Demato - August 17 at 9:30 a.m. ET
 2. Nicholas Glasser - August 18 at 9:30 a.m. ET
 3. David Berry - August 18 at 9:30 a.m. ET
 4. Venecia Guntharp - August 18 at 1:30 p.m. ET
 5. Jeffrey Hurteau - August 19 at 9:30 a.m. ET
 6. Elaine Martinez - August 19 at 9:30 a.m. ET
 7. Matthew Thornton - August 19 at 1:30 p.m. ET
 8. Carrie Krapf - August 20 at 9:30 a.m. ET
 9. Diana Brandes - August 20 at 9:30 a.m. ET
 10. Ryan Murphy - August 20 at 1:30 p.m. ET

We look forward to hearing from you ASAP.

Thanks,
Matt

Matthew Sappington

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8254 • Fax +1 202.831.6084
MSappington@gibsondunn.com • www.gibsondunn.com

From: Stoops, Kevin J <KStoops@sommerspc.com>

Sent: Wednesday, August 11, 2021 4:58 PM

To: Sappington, Matthew <MSappington@gibsondunn.com>

Cc: Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam

<ADoerr@robinsonbradshaw.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; JRusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>; Senger, Molly T. <MSenger@gibsondunn.com>

Subject: Re: Lowe's MDL | Depositions

[WARNING: External Email]

I will be deposing Ram remotely.

Kevin

Sent from my iPhone

On Aug 11, 2021, at 4:56 PM, Sappington, Matthew <MSappington@gibsondunn.com> wrote:

[EXTERNAL EMAIL]

Counsel:

Please note the following with regard to deposition scheduling:

1. Cindi Clark (30(b)(6), Colorado, Nevada, Washington) is available for deposition on 9/7, 9/8, and 9/9. Please confirm whether any of those dates work for you and, if so, please issue an amended notice.
2. We still have not heard from you in response to Molly's July 29 email regarding whether Plaintiffs will be deposing Ram Krishnamurthy—whose deposition is confirmed for 8/25—remotely or in person. Please advise, and please issue an amended notice of deposition for Mr. Krishnamurthy's deposition.

Thanks,
Matt

Matthew Sappington

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8254 • Fax +1 202.831.6084
MSappington@gibsondunn.com • www.gibsondunn.com

From: Sappington, Matthew

Sent: Tuesday, August 10, 2021 9:48 AM

To: Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; kstoops@sommerspc.com; jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>

Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>;

Doerr, Adam <ADoerr@robinsonbradshaw.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; jrusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>; Senger, Molly T. <MSenger@gibsondunn.com>

Subject: RE: Lowe's MDL | Depositions

Counsel:

Further to my email last night, please find attached a revised notice of the deposition of Sean O'Connor.

Thanks,
Matt

Matthew Sappington

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8254 • Fax +1 202.831.6084
MSappington@gibsondunn.com • www.gibsondunn.com

From: Schnitzer, David A.

Sent: Monday, August 9, 2021 9:29 PM

To: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; kstoops@sommerspc.com; jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>

Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; jrusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>; Sappington, Matthew <MSappington@gibsondunn.com>; Senger, Molly T. <MSenger@gibsondunn.com>

Subject: RE: Lowe's MDL | Depositions

Counsel:

In addition to the items in Matt's email immediately below (including confirming the status of the Named Plaintiff deposition noticed for this Thursday), please let us know the status of:

- (1) The discovery responses from the 35 opt-ins for whom discovery was issued on July 7, which had a return date of last Friday, **August 6**—we have not received responses from any of those individuals;
- (2) Named Plaintiff Hursey's responses to the supplemental discovery served on June 17, which were due on **July 19**; and

(3) Your responses to our letters of **June 17 and August 2** regarding various deficiencies with Plaintiffs' discovery responses.

Best,
David

David A. Schnitzer

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.887.3775 • Fax +1 202.530.9611
DSchnitzer@gibsondunn.com • www.gibsondunn.com

From: Sappington, Matthew
Sent: Monday, August 9, 2021 9:12 PM
To: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Senger, Molly T. <MSenger@gibsondunn.com>; kstoops@sommerspc.com
Cc: jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; jrusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>
Subject: RE: Lowe's MDL | Depositions

All:

Please note the following with regard to deposition scheduling, including a request to confirm a deposition scheduled for this Thursday:

1. We still have not heard back from you regarding three Named Plaintiff depositions we re-noticed on 8/2 after the deponents originally cancelled and/or experienced technical difficulties. We also have not heard from you regarding the below 21 Opt-in Plaintiff depositions. Please confirm availability for the below 24 witnesses.
 - a. Named Plaintiffs
 1. Stephani Suazo - August 12 at 10:30 a.m. ET. Please let us know **ASAP** one way or the other regarding Ms. Suazo's deposition.
 2. Jennifer Belaski - August 17 at 9:30 a.m. ET
 3. Kaitlin Forte - August 26 at 9:30 a.m. ET
 - b. Opt-In Plaintiffs
 1. Amanda Demato - August 17 at 9:30 a.m. ET
 2. Nicholas Glasser - August 18 at 9:30 a.m. ET
 3. David Berry - August 18 at 9:30 a.m. ET
 4. Venecia Guntharp - August 18 at 1:30 p.m. ET
 5. Jeffrey Hurteau - August 19 at 9:30 a.m. ET

6. Elaine Martinez - August 19 at 9:30 a.m. ET
 7. Matthew Thornton - August 19 at 1:30 p.m. ET
 8. Carrie Krapf - August 20 at 9:30 a.m. ET
 9. Diana Brandes - August 20 at 9:30 a.m. ET
 10. Ryan Murphy - August 20 at 1:30 p.m. ET
 11. Tom Robinson - August 23 at 9:30 a.m. ET
 12. Trent McQueen - August 23 at 1:30 p.m. ET
 13. Heather Dowell - August 24 at 9:30 a.m. ET
 14. Justen Moore - August 24 at 1:30 p.m. ET
 15. Alesandro Camargo - August 24 at 1:30 p.m. ET
 16. BJ Pope - August 26 at 9:30 a.m. ET
 17. James Salyers - August 26 at 1:30 p.m. ET
 18. Margaret Stanton - August 27 at 9:30 a.m. ET
 19. David DeLorenzo - August 30 at 1:30 p.m. ET
 20. Michael Young - August 31 at 9:30 a.m. ET
 21. Oscar Valiente - August 31 at 1:30 p.m. ET
2. Lowe's is noticing the depositions of 25 additional Opt-in Plaintiffs. Please advise ASAP whether they can appear on the noticed dates.
1. William Long - August 25 at 9:30 a.m. ET
 2. Crystal Rowe - August 25 at 1:30 p.m. ET
 3. Jeffrey Zier - August 27 at 1:30 p.m. ET
 4. James Hight - August 30 at 9:30 a.m. ET
 5. Arthur Romero - September 1 at 9:30 a.m. ET
 6. Elizabeth Nickel - September 1 at 1:30 p.m. ET
 7. Dawn Gunnoe - September 2 at 9:30 a.m. ET
 8. Jessica Alvarado - September 2 at 1:30 p.m. ET
 9. Christopher Johnson - September 3 at 9:30 a.m. ET
 10. Cameron Quick - September 3 at 1:30 p.m. ET
 11. Georgina Ortiz - September 7 at 9:30 a.m. ET
 12. Susy Rader - September 7 at 1:30 p.m. ET
 13. Michelle Shepherd - September 8 at 9:30 a.m. ET
 14. Sharon Durling - September 8 at 1:30 p.m. ET
 15. Keith Ayer - September 9 at 9:30 a.m. ET
 16. Jason Lugo - September 9 at 1:30 p.m. ET
 17. Stephen Schermann - September 10 at 9:30 a.m. ET
 18. Matthew Arens - September 10 at 1:30 p.m. ET
 19. Teresa Krogman - September 13 at 9:30 a.m. ET
 20. Sarah Austin - September 13 at 1:30 p.m. ET
 21. Trisha Hern - September 14 at 9:30 a.m. ET
 22. James Justice - September 14 at 1:30 p.m. ET
 23. Brian Alto - September 15 at 9:30 a.m. ET
 24. Sandra Keenon - September 15 at 1:30 p.m. ET
 25. Tammy Austin - September 16 at 9:30 a.m. ET
3. **Sean O'Connor** is confirmed for August 16 at 9:30 a.m. ET (hard stop at 2:30 p.m. ET). We will send a revised notice tomorrow.
4. **James Hilliard** is available to be deposed on August 18 and 19. Please confirm whether either of those dates work for you; if so, please let us know your desired start time (*i.e.* 9:30 a.m. ET or 1:30 p.m. ET) and send a notice.

5. **Albert Preiwisch** is available to be deposed on September 9 and 10. Please confirm whether either of those dates work for you; if so, please let us know your desired start time (*i.e.* 9:30 a.m. ET or 1:30 p.m. ET) and send a notice.

Thanks,
Matt

Matthew Sappington

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8254 • Fax +1 202.831.6084
MSappington@gibsondunn.com • www.gibsondunn.com

From: Sappington, Matthew
Sent: Friday, August 6, 2021 3:48 PM
To: 'Vanderbeke, Danelle J' <DVanderbeke@sommerspc.com>; Senger, Molly T. <MSenger@gibsondunn.com>; kstoops@sommerspc.com
Cc: jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; jrusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>
Subject: RE: Lowe's MDL | Depositions

Good afternoon, all:

Please note the following with regard to deposition scheduling:

1. **Nathan Bradfield** is confirmed for 8/30 at 9:30 a.m. ET
2. **Ben Boldin** is confirmed for 9/10 at 9:30 a.m. ET
3. **Jason Cottle** can do 9/13 at 1:30 p.m. ET. Please confirm whether that timing works for you.

Thanks,
Matt

Matthew Sappington

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306

From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Sent: Thursday, August 5, 2021 4:32 PM
To: Sappington, Matthew <MSappington@gibsondunn.com>; Senger, Molly T. <MSenger@gibsondunn.com>; kstoops@sommerspc.com
Cc: jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVAughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; jrusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Subject: RE: Lowe's MDL | Depositions

[WARNING: External Email]

Good Afternoon Counsel,

Please find attached deposition notices for the following:

- Corrected 2nd Amended Notice for Douglas Goto (30(b)(6) MD,WV)-September 2, 2021 at 9:30am ET
- 2nd Amended Notice for James Brandt (30(b)(6) AR, MN, MO)- August 26, 2021 at 9:30am ET
- Amended Notice for Richard Hughes- September 2, 2021 at 9:30am ET

In regards to your earlier email today:

- Please confirm Nathan Bradfield's deposition for August 30, 2021 at 9:30am ET
- Please confirm Ben Boldin's deposition for September 10, 2021 at 9:30am ET
- Please confirm Jason Cottle's deposition for September 13, 2021 at 9:30am ET
- Amended deposition notices will follow

Please find updates below regarding availability:

- Opt-In Sean O'Connor is not available on August 25, 2021, but he is available on August 16, 2021 at 9:30am ET with a hard stop at 2:30pm ET.
- Named Plaintiff Kindsay Estes is available on August 20, 2021.
- Please provide dates of availability for Cindi Clark (30(b)(6) CO, NV, WA) in September

We are continuing our efforts to get dates of availability and confirm dates for the remaining requested depositions.

Thank you.

Regards,

Danelle J. Vanderbeke

Class Action and Complex Litigation Group

One Towne Square, 17th Floor | Southfield, MI 48076

Direct Dial: (248) 746-4593 | Direct Fax: (248) 936-2147

dvanderbeke@sommerspc.com | www.sommerspc.com



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From: Sappington, Matthew <MSappington@gibsondunn.com>

Sent: Thursday, August 5, 2021 1:43 PM

To: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Senger, Molly T.

<MSenger@gibsondunn.com>; Stoops, Kevin J <KStoops@sommerspc.com>

Cc: Thompson, Jason J <JThompson@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G.

<KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A.

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<CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri

<amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton

R <TKashima@sommerspc.com>; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E

<WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette

<ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>;

jrusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>

Subject: RE: Lowe's MDL | Depositions

[EXTERNAL EMAIL]

Counsel:

Please note the following with regard to deposition scheduling:

1. **Nathan Bradfield** is available to be deposed on 8/30–9/2.
2. **Ben Boldin** is available to be deposed on 9/10.
3. **Jason Cottle** is available to be deposed on 9/13 and 9/27.

We still are checking on dates for your other requested deponents and will get back to you as soon as we can. In the meantime, please confirm ASAP whether the above dates (and the dates in my 8/4 email below) work for you.

Thanks,
Matt

Matthew Sappington

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8254 • Fax +1 202.831.6084
MSappington@gibsondunn.com • www.gibsondunn.com

From: Sappington, Matthew
Sent: Wednesday, August 4, 2021 1:53 PM
To: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Senger, Molly T. <MSenger@gibsondunn.com>; kstoops@sommerspc.com
Cc: jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; jrusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>
Subject: RE: Lowe's MDL | Depositions

Counsel:

Please note the following with regard to deposition scheduling:

1. **James Brandt** (30(b)(6), AR, MN, and MO) is available to be deposed on 8/26 and 8/27. Please confirm whether either of those dates work for you.
2. **Cindi Clark** (30(b)(6), CO, NV, and WA)—currently scheduled for 8/12—needs to be postponed. We will circle back with proposed new dates ASAP.
3. **Richard Hughes** is available to be deposed on 8/30–9/2. Please confirm whether any of those dates work for you.
4. **Douglas Goto**. As stated in Danelle's 7/30 email, Mr. Goto is the 30(b)(6) representative for Maryland and West Virginia. We assume that the references to Arkansas in the attached 2nd amended notice for Mr. Goto simply were clerical errors. Please proceed with a new notice for Mr. Goto.

We still are checking on dates for your other requested deponents and will get back to you as soon as we can.

Thanks,
Matt

Matthew Sappington

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8254 • Fax +1 202.831.6084
MSappington@gibsondunn.com • www.gibsondunn.com

From: Sappington, Matthew

Sent: Monday, August 2, 2021 9:42 PM

To: 'Vanderbeke, Danelle J' <DVanderbeke@sommerspc.com>; Senger, Molly T.

<MSenger@gibsondunn.com>; kstoops@sommerspc.com

Cc: jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRash@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; jrusch@johnsonbecker.com; Gorman, Brian <BGorman@gibsondunn.com>

Subject: RE: Lowe's MDL | Depositions

All:

Please find attached notices of depositions for the below-listed individuals. As you will see, because we have not heard from you regarding the deponents' availability, we have selected dates in August beginning on August 12. Please advise as soon as possible whether they can appear on the noticed dates.

Named Plaintiffs

- Stephanie Suazo - August 12 at 10:30 a.m. ET
- Jennifer Belaski - August 17 at 9:30 a.m. ET
- Kindsey Estes - August 20 at 9:30 a.m. ET
- Kaitlin Forte - August 26 at 9:30 a.m. ET

Opt-In Plaintiffs

- Amanda Demato - August 17 at 9:30 a.m. ET
- Nicholas Glasser - August 18 at 9:30 a.m. ET
- Jeffrey Hurteau - August 19 at 9:30 a.m. ET
- Carrie Krapf - August 20 at 9:30 a.m. ET
- Alesandro Camargo - August 24 at 1:30 p.m. ET
- Sean O'Connor - August 25 at 9:30 a.m. ET
- BJ Pope - August 26 at 9:30 a.m. ET
- James Salyers - August 26 at 1:30 p.m. ET

- Margaret Stanton - August 27 at 9:30 a.m. ET
- David DeLorenzo - August 30 at 1:30 p.m. ET
- Michael Young - August 31 at 9:30 a.m. ET
- Oscar Valiente - August 31 at 1:30 p.m. ET

Furthermore, there are 10 additional opt-in plaintiffs whose depositions Lowe's is noticing. Please advise as soon as possible whether they can appear on the noticed dates.

Additional Opt-In Plaintiffs

- David Berry - August 18 at 9:30 a.m. ET
- Venecia Guntharp - August 18 at 1:30 p.m. ET
- Elaine Martinez - August 19 at 9:30 a.m. ET
- Matthew Thornton - August 19 at 1:30 p.m. ET
- Diana Brandes - August 20 at 9:30 a.m. ET
- Ryan Murphy - August 20 at 1:30 p.m. ET
- Tom Robinson - August 23 at 9:30 a.m. ET
- Trent McQueen - August 23 at 1:30 p.m. ET
- Heather Dowell - August 24 at 9:30 a.m. ET
- Justen Moore - August 24 at 1:30 p.m. ET

Thanks,
Matt

Matthew Sappington

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8254 • Fax +1 202.831.6084
MSappington@gibsondunn.com • www.gibsondunn.com

From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Sent: Friday, July 30, 2021 5:39 PM
To: Senger, Molly T. <MSenger@gibsondunn.com>; kstoops@sommerspc.com
Cc: jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; Sappington, Matthew <MSappington@gibsondunn.com>; jrusch@johnsonbecker.com; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Gorman, Brian <BGorman@gibsondunn.com>
Subject: RE: Lowe's MDL | Depositions

[WARNING: External Email]

Counsel,

Please find amended deposition notices for the following:

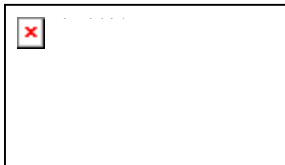
- 30(b)(6) Coby Leleaux/PA- August 16 at 9:30am ET
- 30(b)(6) Ramandeep Kakar/OH- August 18 at 9:30am ET
- 30(b)(6) Nicholas Caughell/IL- August 27 at 9:30am ET
- 30(b)(6) Douglas Goto/ MD, WV- September 2 at 9:30am ET
- Stuart Whitman- August 26 at 9:30am ET

Thank you.

Regards,

Danelle J. Vanderbeke

Class Action and Complex Litigation Group
One Towne Square, 17th Floor | Southfield, MI 48076
Direct Dial: (248) 746-4593 | Direct Fax: (248) 936-2147
dvanderbeke@sommerspc.com | www.sommerspc.com



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From: Senger, Molly T. <MSenger@gibsondunn.com>

Sent: Thursday, July 29, 2021 12:21 PM

To: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Stoops, Kevin J <KStoops@sommerspc.com>

Cc: Thompson, Jason J <JThompson@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton R <TKashima@sommerspc.com>; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; Sappington, Matthew <MSappington@gibsondunn.com>

Subject: RE: Lowe's MDL | Depositions

[EXTERNAL EMAIL]

Counsel:

Please note the following with respect to deposition scheduling:

1. **Ram Krishnamurthy**—which has been confirmed for 8/25—will proceed in person in North Carolina on our end. If you wish to be remote while we are there in person, please let us know.
2. **Douglas Goto** (30(b)(6), MD and WV) is available on your requested date of 9/2. Please confirm that date still works.
3. **Coby Leleaux** (30(b)(6), PA) is confirmed for 8/16 at 9:30 a.m. EDT.
4. **James Brandt** (30(b)(6), AR, MN, and MO)—currently scheduled for 8/5—needs to be postponed. We will circle back with proposed new dates ASAP.

Thanks,
Molly

Molly Senger

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8571 • Fax +1 202.530.4209
MSenger@gibsondunn.com • www.gibsondunn.com

From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Sent: Wednesday, July 28, 2021 4:04 PM
To: kstoops@sommerspc.com; Senger, Molly T. <MSenger@gibsondunn.com>
Cc: jthompson@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRash@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Subject: RE: Lowe's MDL | Depositions

[WARNING: External Email]

Counsel,

Please be advised that we have been in contact with Opt-In Christopher Russo and we will be cancelling his deposition scheduled for Friday, July 30th. Mr. Russo will be dismissed from the litigation.

Thank you.

Regards,

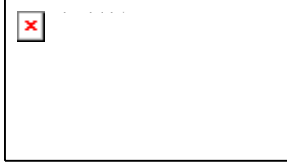
Danelle J. Vanderbeke

Class Action and Complex Litigation Group

One Towne Square, 17th Floor | Southfield, MI 48076

Direct Dial: (248) 746-4593 | Direct Fax: (248) 936-2147

dvanderbeke@sommerspc.com | www.sommerspc.com



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From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>

Sent: Tuesday, July 27, 2021 6:09 PM

To: Stoops, Kevin J <KStoops@sommerspc.com>; Senger, Molly T. <MSenger@gibsondunn.com>

Cc: Thompson, Jason J <JThompson@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton R <TKashima@sommerspc.com>; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>

Subject: RE: Lowe's MDL | Depositions

Good Evening Counsel,

Thank you for the updates. In further response to your email from yesterday:

- Please confirm the 30(b)(6) deposition of Coby Leleaux/Pennsylvania for August 16th at 9:30am EDT. An amended notice will follow.
- I am confirming our availability for dates provided by 30(b)(6) Nicholas Caughell/ Illinois and Ramandeep Kakar/Ohio. Deposition notices will follow once confirmed.
- Please forward dates of availability for the following:
 - Vanessa Church, Workforce Management Analyst
 - Valerie Lane, former Area HR Manager
 - Nathan Bradfield, Senior Corporate Investigator
 - David Williams, former store manager of store #2823

- Ismet Eikn, former store manager
 - Albert Preiwisch, former store manager of store #0191
 - Scott Knapp, former store manager of store #0080
- Named Plaintiff Kindsay Estes is changing jobs and will provide dates for her deposition once she is settled.
 - Opt-Ins Sean O'Connor and James Salyers are working with their employer to get dates of availability for their deposition.
 - We are continuing to contact the remaining Named Plaintiffs and Opt-Ins for availability to reschedule/schedule their depositions.

Thank you.

Regards,

Danelle J. Vanderbeke

Class Action and Complex Litigation Group
 One Towne Square, 17th Floor | Southfield, MI 48076
 Direct Dial: (248) 746-4593 | Direct Fax: (248) 936-2147
dvanderbeke@sommerspc.com | www.sommerspc.com

<image001.png>

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From: Stoops, Kevin J <KStoops@sommerspc.com>
Sent: Monday, July 26, 2021 9:04 PM
To: Senger, Molly T. <MSenger@gibsondunn.com>
Cc: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Thompson, Jason J <JThompson@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>; Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton R <TKashima@sommerspc.com>; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Zack Kaylor <zkaylor@johnsonbecker.com>
Subject: Re: Lowe's MDL | Depositions

Molly

I can confirm the dates you provided for the Whitman and Ram dep.

Thanks

Kevin

Sent from my iPhone

On Jul 26, 2021, at 8:05 PM, Senger, Molly T. <MSenger@gibsondunn.com> wrote:

[EXTERNAL EMAIL]

Counsel:

In terms of your two emails on Friday afternoon regarding deposition dates and scheduling, please see below:

- **James Hilliard** needs to reschedule his 8/3 deposition. He is currently out of the office, but we will revert with new dates shortly.
- **Coby Leleaux (30(b)(6), PA)** needs to reschedule his 8/2 deposition. Mr. Leleaux is available 8/16, 8/17, or 8/19. Please let us know if one of those dates would work.
- **Nicholas Caughell (30(b)(6), IL)** is available to be deposed 8/18 – 8/20, or 8/25-8/27. Please let us know if one of those dates would work.
- **Ram Krishnamurthy** is available 8/25. Please let us know ASAP if that date works.
- **Stuart Whitman** is available to be deposed on 8/26.
- We are checking with **Doug Goto (30(b)(6), MD)** to see if any of your requested dates will work.
- Regarding the requested date for **Janice Dupré Little**, Executive Vice President, Human Resources: Please provide more information for the basis of the request to depose Ms. Little. There is “no question” that, as an Executive Vice President, she is covered by the apex doctrine. *Performance Sales & Mktg. LLC v. Lowe’s Cos.*, No. 5:07-CV-00140-RLV, 2012 WL 4061680, at *1, 4 (W.D.N.C. Sept. 14, 2012) (reversing order allowing deposition of three Lowe’s executives, including two Executive Vice Presidents). Moreover, she has been in her current role for just over a year. Press Release, Lowe’s Appoints Janice Dupre Little Executive Vice President, Human Resources (June 23, 2020), <https://prn.to/3rzwJid>. That underscores her lack of the “unique or special knowledge of the facts at issue” required for a deposition of a high-ranking corporate officer. *Performance Sales*, 2012 WL 4061680, at *3. Beyond that, the doctrine requires that “other less burdensome avenues for obtaining the information sought have been exhausted.” *Id.* Accordingly, Lowe’s requests that you provide information justifying the deposition of Ms. Little. See also e.g., *RLI Ins. Co. v. Nexus Servs., Inc.*, No. 5:18-CV-00066, 2020 WL 2311668, at *3 (W.D. Va. May 8, 2020); *Smithfield Bus. Park, LLC v. SLR Int’l Corp.*, No. 5:12-CV-282-F, 2014 WL 547078, at *2 (E.D.N.C. Feb. 10, 2014).

Thanks,
Molly

Molly Senger

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Sent: Friday, July 23, 2021 4:28 PM
To: Senger, Molly T. <MSenger@gibsondunn.com>; jthompson@sommerspc.com; kstoops@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>
Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Subject: RE: Lowe's MDL | Depositions

[WARNING: External Email]

Counsel,

Please find attached amended deposition notices regarding the following:

- Monday, August 2, 2021-30(b)(6) Pennsylvania/Coby Leleaux
- Tuesday, August 3, 2021- 30(b)(6) New Mexico/ Bret Romero
- Wednesday, August 4, 2021- 30(b)(6) CT, NJ/ Paula Rubio
- Thursday, August 5, 2021- 30(b)(6) AR, MN, MO/ James Brandt
- Thursday, August 12, 2021-30(b)(6) CO, NV, WA/ Cindi Clark
- Friday, August 27, 2021- 30(b)(6) NY, MA/ Heidi Crowel
- Tuesday, August 31, 2021- 30(b)(6) NC, SC/ Jenn Nagy

Please advise of the following:

If 30(b)(6) Douglas Goto (MD, WV) is available August 30, 31 or September 1, 2, 3 to reschedule his deposition. August 25 does not work for us.

If Executive Vice President of Human Resources-Janice Dupre-Little is available for a deposition in early September.

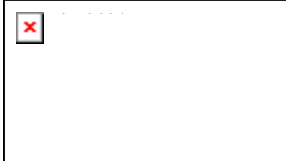
If Stuart Whitman is available August 25 or 26 to reschedule his deposition. August 20 does not work for us.

Thank you.

Regards,

Danelle J. Vanderbeke

Class Action and Complex Litigation Group
One Towne Square, 17th Floor | Southfield, MI 48076
Direct Dial: (248) 746-4593 | Direct Fax: (248) 936-2147
dvanderbeke@sommerspc.com | www.sommerspc.com



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From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Sent: Friday, July 23, 2021 4:03 PM
To: Senger, Molly T. <MSenger@gibsondunn.com>; Thompson, Jason J <JThompson@sommerspc.com>; Stoops, Kevin J <KStoops@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>
Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton R <TKashima@sommerspc.com>; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Subject: RE: Lowe's MDL | Depositions

Good Afternoon Counsel,

Please find attached the links from Veritext regarding the following depositions:

- Tuesday, July 27, 2021 at 9:30am EDT- 30b6 Kentucky/A.J. Henry
- Tuesday, August 3, 2021 at 9:30am EDT- James Hilliard

- Thursday, August 5, 2021 at 9:30am EDT- Dennis Shanley
- Wednesday, August 11, 2021 at 9:30am EDT- Annette Groseclose

Please be advised that if you would like to request any additional services that Veritext offers (Rough draft, Realtime, etc.) please contact Ross Keating at calendar-corp@veritext.com to schedule.

Thank you.

Regards,

Danelle J. Vanderbeke

Class Action and Complex Litigation Group
One Towne Square, 17th Floor | Southfield, MI 48076
Direct Dial: (248) 746-4593 | Direct Fax: (248) 936-2147
dvanderbeke@sommerspc.com | www.sommerspc.com

<image002.png>

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From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>

Sent: Thursday, July 22, 2021 5:51 PM

To: Senger, Molly T. <MSenger@gibsondunn.com>; Thompson, Jason J <JThompson@sommerspc.com>; Stoops, Kevin J <KStoops@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>

Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton R <TKashima@sommerspc.com>; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Zack Kaylor <zkaylor@johnsonbecker.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>

Subject: RE: Lowe's MDL | Depositions

Good Afternoon Counsel,

We are cancelling Opt-In Robin Shaw's deposition for tomorrow. Robin Shaw will be dismissed from the litigation.

Please find attached an Amended Notice of Deposition for the following:

James Hilliard- August 3, 2021 at 9:30am ET
Dennis Shanley- August 5, 2021 at 9:30am ET
Annette Groseclose- August 11, 2021 at 9:30am ET

Thank you.

Regards,

Danelle J. Vanderbeke

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dvanderbeke@sommerspc.com | www.sommerspc.com

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From: Vanderbeke, Danelle J
Sent: Wednesday, July 21, 2021 5:32 PM
To: 'Senger, Molly T.' <MSenger@gibsondunn.com>; Thompson, Jason J <JThompson@sommerspc.com>; Stoops, Kevin J <KStoops@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>
Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton R <TKashima@sommerspc.com>; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; 'Fitzgerald, Cara' <CFitzgerald@gibsondunn.com>; 'Zack Kaylor' <zkaylor@johnsonbecker.com>
Subject: RE: Lowe's MDL | Depositions

Good Afternoon Counsel,

We are cancelling Named Plaintiff Daniel Gerber's deposition for tomorrow. Mr. Gerber will be dismissed from the case.

Please find a second amended deposition notice for A.J. Henry/Kentucky confirming his deposition as the designee for Kentucky on Tuesday, July 27th at 9:30am ET.

We are confirming dates for the rescheduled depositions below and will get back to you as soon as possible.

Thank you.

Regards,

Danelle J. Vanderbeke

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Direct Dial: (248) 746-4593 | Direct Fax: (248) 936-2147
dvanderbeke@sommerspc.com | www.sommerspc.com

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From: Senger, Molly T. <MSenger@gibsondunn.com>
Sent: Wednesday, July 21, 2021 9:50 AM
To: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Thompson, Jason J <JThompson@sommerspc.com>; Stoops, Kevin J <KStoops@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>
Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; Kashima, Trenton R <TKashima@sommerspc.com>; Ash, Rob <CRAsh@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>
Subject: RE: Lowe's MDL | Depositions

[EXTERNAL EMAIL]

Counsel:

Thank you for the information. We look forward to receiving dates for the individuals you have identified.

In terms of A.J. Henry, the Notice that you have attached is for Arkansas, and Henry is the designee for Kentucky. Please confirm you plan to proceed with Henry's deposition for Kentucky on 7/27.

Please note that July 23rd no longer works for Mr. Kakar's deposition (OH). He is available the week of 8/16. Please let us know a date that week that would work for his deposition.

In addition, July 30th no longer works for Ms. Clark's deposition (CO, NV, WA). She is available 8/10-8/12, or 8/25-8/27. Please let us know a date in those windows that would work for her deposition.

Mr. Goto (MD) is available to be deposed on 8/25. Ms. Crowel (NY, MA) is available to be deposed on 8/27 or 8/31. Jenn Nagy (NC, SC) is available to be deposed 8/18-8/19, 8/23-8/24, or 8/30-8/31.

Mr. Whitman is not available August 2-4 but could be available 8/20.

We can confirm Genna Hickey's deposition for Tuesday, August 3, 2021 at 9:30 am ET; however, Annette Groseclose's deposition needs to be moved from 8/9 to 8/11. Please confirm 8/11 works on your end.

We will revert with availability for Mr. Krishnamurthy and Mr. Caughell (IL).

Thanks,
Molly

Molly Senger

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8571 • Fax +1 202.530.4209
MSenger@gibsondunn.com • www.gibsondunn.com

From: Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Sent: Monday, July 19, 2021 6:17 PM
To: jthompson@sommerspc.com; Senger, Molly T. <MSenger@gibsondunn.com>; kstoops@sommerspc.com; Seth Lesser <seth@klafterlesser.com>; Bailey, Elaina S <EBailey@sommerspc.com>
Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>; Fitzgerald, Cara <CFitzgerald@gibsondunn.com>; Timothy Becker <tbecker@johnsonbecker.com>; Amir Alimehri <amir.alimehri@klafterlesser.com>; Johnston, Rod M <RJohnston@sommerspc.com>; tkashima@sommerspc.com; Ash, Rob <CRAsh@sommerspc.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>; Vaughn, Wendy E <WVaughn@sommerspc.com>; Nichols, Debbie A <DNichols@sommerspc.com>; DeCoste, Annette <ADeCoste@sommerspc.com>
Subject: RE: Lowe's MDL | Depositions

[External Email]
Good Evening Counsel,

Please find updates and responses to your July 15th email below:

- I have been in contact with Kindsay Estes, Oscar Valiente, James Salyers and Sean O'Connor. They are currently checking their schedules and I will let you know as soon as I have dates.
- We are continuing our efforts to reschedule Jennifer Belaski, Jeffrey Hurteau, Margaret Stanton, Amanda Demato, Nicholas Glasser, Carrie Krapf, Bettie Jean Pope, Kaitlin Forte and David DeLorenzo. I will confirm dates as soon as I have them.
- Confirmed, A.J. Henry's (KY) deposition July 27th at 9:30am ET.
- We would like to depose Stuart Whitman and Ram Krishnamurthy on August 2nd, 3rd or 4th. Please advise of their availability for these dates.
- Please confirm Genna Hickey's deposition for Tuesday, August 3, 2021 at 9:30am ET and Annette Groseclose's deposition for Monday, August 9, 2021 at 9:30am ET.
- Please advise of new dates of availability for 30(b)(6) deponents Doug Goto (MD, WV), Heidi Crowel (NY, MA), Jenn Nagy (NC, SC) and Nicholas Caughell (IL).
- For scheduling purposes, please forward the deponent/attorney information for the following 30(b)(6) depositions at your earliest convenience: July 23rd/Ramandeep Kakar (OH), July 27th/ A.J. Henry (KY) and July 30th/Cindi Clark (CO, NV, WA).

Please find amended deposition notices attached. Thank you.

Regards,

Danelle J. Vanderbeke

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dvanderbeke@sommerspc.com | www.sommerspc.com

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From: Thompson, Jason J <JThompson@sommerspc.com>
Sent: Thursday, July 15, 2021 3:02 PM
To: Senger, Molly T. <MSenger@gibsondunn.com>; Stoops, Kevin J <KStoops@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>
Subject: RE: Lowe's MDL | 30(b)(6) Depositions; Mediation Date

These are all fine Molly, including the mediation.

From: Senger, Molly T. <MSenger@gibsondunn.com>
Sent: Thursday, July 15, 2021 2:55 PM
To: Thompson, Jason J <JThompson@sommerspc.com>; Stoops, Kevin J <KStoops@sommerspc.com>; Seth Lesser <seth@klafterlesser.com>; Vanderbeke, Danelle J <DVanderbeke@sommerspc.com>
Cc: Schwartz, Jason C. <JSchwartz@gibsondunn.com>; Nelson, Karl G. <KNelson@gibsondunn.com>; Doerr, Adam <ADoerr@robinsonbradshaw.com>; Schnitzer, David A. <DSchnitzer@gibsondunn.com>; Dziuban, Michael R. <MDziuban@gibsondunn.com>
Subject: Lowe's MDL | 30(b)(6) Depositions; Mediation Date

[EXTERNAL EMAIL]

All:

We have some slight scheduling tweaks that we need to make to the 30(b)(6) deposition schedule.

We need to postpone the depositions of Ms. Nagy, who was set to be deposed on 7/27 (NC, SC), and Ms. Crowel (NY, MA), who was set for 7/26. We also need to move A.J. Henry (KY) (currently set to be deposed on 7/21), but we have confirmed that Mr. Henry is available on the 7/27 date vacated by Ms. Nagy, so we would suggest slotting him for that date. Separately, we will need to move the 7/22 date for Doug Goto (MD, WV) and the 7/29 date for Caughell (IL) to sometime in August; we will revert shortly with possible new dates for Goto, Nagy, Crowel and Caughell.

In the meantime, please confirm we can plan to proceed with Henry on 7/27, in place of Ms. Nagy.

The schedule for the next three weeks therefore would be as follows:

7/23 – Kakar (OH)
7/27 – Henry (KY)
7/30 – Clark (CO, NV, WA)
8/2 – Leleaux (PA)
8/3 – Romero (NM)

8/4 – Rubio (CT, NJ)
8/5 – Brandt (AR, MN, MO)

Separate from the above, please note that we have confirmed with Lowe's that **9/29 is our preferred mediation date**, which is still available for Linda Singer. Please let us know if we can proceed to confirm that date with Singer.

Look forward to speaking with you all later this afternoon.

Thanks,
Molly

Molly Senger

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306
Tel +1 202.955.8571 • Fax +1 202.530.4209
MSenger@gibsondunn.com • www.gibsondunn.com

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